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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Michael E. Farbiarz
	:	
v.	:	Civil Action No. 24-5863
	:	
THE CONTENTS OF THE	:	<u>NOTICE OF MOTION FOR</u>
FOLLOWING ACCOUNTS:	:	<u>DEFAULT JUDGMENT AND</u>
	:	<u>FINAL ORDER OF</u>
JP MORGAN CHASE ACCOUNT	:	<u>FORFEITURE</u>
ENDING IN 9483 IN THE NAME OF	:	
JAE CHOI ATTORNEY TRUST	:	
ACCOUNT, <i>et al.</i> ,	:	
	:	
Defendants <i>in rem.</i>	:	

PLEASE TAKE NOTICE that on March 3, 2025, at 10:00 a.m., or as soon thereafter as counsel may be heard, the United States will move this Court for the entry of Default Judgment and Final Order of Forfeiture pursuant to Fed. R. Civ. P. 55(b), ordering the forfeiture of the following properties:

1. The contents of the following accounts:
 - a. JP Morgan Chase account ending in 9483 in the name of Jae Choi Attorney Trust Account;
 - b. Bank of America account ending in 4685 in the name of Smart Learning, Inc.;
 - c. JP Morgan Chase account ending in 0711 in the name of Hee Ah Nam;

- d. TD Bank account ending in 2483 in the name of Hee Ah Nam;
 - e. Bank of America account ending in 6030 in the name of Hee Ah Nam;
 - f. Bank of America account ending in 6043 in the name of Hee Ah Nam;
 - g. JP Morgan Chase account ending in 9900 in the name of Hudson Asset Holding Corp;
 - h. JP Morgan Chase account ending in 4413 in the name of Hudson Asset Holding Corp;
 - i. JP Morgan Chase account ending in 0353 in the name of Virtua Education, Inc.;
 - j. JP Morgan Chase account ending in 4827 in the name of Virtua Education, Inc.; and
 - k. TD Ameritrade account ending in 2857 in the name of Hee Ah Nam;
2. Approximately \$100,517.24 from an account at TD Bank ending in 1237 in the name of Hee Ah Nam; and
3. The real property located at 125 13th Street, Cresskill, New Jersey.

In support of said motion, the United States will rely upon the attached Declaration of Assistant United States Attorney Peter A. Laserna. Pursuant to Civil Rule 7.1(d)(4) of the Local Civil and Criminal Rules of the United States District Court for the District of New Jersey, no brief is necessary because the United States has reached a settlement with Claimant Hee Ah Nam (*see* Stipulation, ECF No. 30-2), the only person or entity who has filed a claim in the above-captioned civil forfeiture action.

Dated: January 27, 2025
Newark, New Jersey

s/Peter A. Laserna
PETER A. LASERNA
Assistant United States Attorney